



Contented Modern Slavery and Trafficking Policy and Statement

Version 4, October 2026

Contents

Document Change History

Scope

Definitions

Policy

Our commitments

Statement

One-year action plan

Key performance indicators

Continuous Improvement

Further Information

Board approval

Document Change History

This is our third version of this policy and is a Controlled Document within our Quality Management System, certified to ISO9001:2015, replacing any legacy documents from previous assessment activity.

Version 4, October 2026: Updated prior to completion of the voluntary Modern Slavery Assessment. Clarified Tier 1 supply-chain mapping, worker safeguards, proportionate due diligence, responsible purchasing, awareness and training, reporting arrangements, KPIs and the 12-month action plan.

Scope

Contented Ltd, trading as Contented ESG, helps organisations strengthen sustainability, ESG and Social Value through practical strategy, leadership development, communications, diagnostics and capacity building. Our purpose is to inspire responsible innovation around the world.

We work with SMEs, larger organisations, public bodies, universities and supply-chain partners, particularly in engineering, manufacturing, transport and related sectors. Our services may include sustainability and ESG maturity assessments, Social Value support, carbon reduction planning, responsible procurement, customer due diligence, thought leadership, research, training, coaching and accelerator programmes.

Although Contented does not meet the financial threshold that requires a modern slavery statement under the Modern Slavery Act 2015, we choose to promote responsible practice. We recognise that modern slavery risks can arise through clients, suppliers, freelancers, delivery partners and wider supply chains, including those connected with goods and services sourced in the UK and internationally.

Our initial supply-chain mapping focuses on Tier 1 suppliers with whom Contented has a direct relationship. These include directly contracted freelancers, subcontractors, sole traders, directors of small supplier companies and other organisations supplying goods or services directly to Contented.

This policy applies to directors, employees, workers, freelancers, contractors and anyone else working for or on behalf of Contented. It also informs how we select and work with clients, suppliers and delivery partners. If staff are unsure how it might affect their activities, or have any questions about its application, they should follow this policy before seeking advice or guidance from external organisations. Wherever possible, these systems have been designed to closely align with our existing internal quality management systems, as set out in our Quality Manual, which are based on collaborative learning and development principles and certified to ISO9001:2015.

Definitions

Modern slavery is a crime resulting in an abhorrent abuse of human rights. It is constituted in the Modern Slavery Act 2015 by the offences of 'slavery, servitude and forced or compulsory labour' and 'human trafficking'.

The Modern Slavery Act contains a clause on Transparency in Supply Chains which addresses the role of businesses in preventing modern slavery from occurring in their supply chains and organisations.

Organisations have a responsibility to ensure they use supply chains that are ethical and that demonstrate good employment practices. We therefore aim to develop proportionate procurement and supplier-review processes so that relevant suppliers understand our expectations and modern slavery risks are considered where appropriate.

Policy

The Modern Slavery Act 2015, Section 54, requires that:

- All organisations with turnover over £36 million or more must prepare and publish a slavery and human trafficking statement each financial year. The slavery and human trafficking statement should set out what steps have been taken to ensure modern slavery is not taking place in their business or supply chains.
- The statement must be approved by an appropriate senior person within the organisation and published prominently on the organisation's website (or available on request if the organisation does not have a website).

Contented specialises in helping engineering companies to generate and disseminate insights into the complex challenges that matter to it.

As a responsible company, although we don't meet the £36m threshold, we endeavour to promote responsible practice. That includes publishing and promoting a statement to our stakeholders.

Our commitments

In our own operations, and in the standards we expect of those working for or on behalf of Contented, we support:

- adherence to applicable local and national employment and human rights laws;
- the freedom of workers to terminate employment in accordance with their contract and applicable law;
- freedom of movement and freedom of association;
- freedom from violence, harassment, intimidation and coercion;
- no worker-paid recruitment fees;
- no forced or compulsory overtime;
- no child labour;
- no discrimination;
- no confiscation or withholding of workers' original identity documents; and
- access to appropriate reporting, support and referral where concerns about modern slavery or exploitation arise.

Contented does not charge workers recruitment fees and expects anyone recruiting or supplying workers on our behalf not to charge workers recruitment fees or retain workers' original identity documents.

Statement

We judge that our main potential risks arise through:

- organisations with which we choose to work;
- organisations from which we buy supplies and services;
- freelancers, subcontractors and delivery partners working on our behalf; and
- goods and services where employment practices or extended supply chains are not readily visible to us.

Contented's direct delivery suppliers are mainly freelancers, sole traders, subcontractors or directors of small supplier companies. Our immediate focus is therefore on understanding and reviewing our Tier 1 relationships proportionately.

We have begun mapping relevant supply-chain information through our Scope 3 carbon assessment, including information connected with equipment such as laptops. We will build on this work to consider modern slavery and labour-rights risks within relevant Tier 1 relationships.

We will consider whether our own purchasing practices, including pricing, payment terms, lead times, specifications and changes to contracted work, could place unreasonable pressure on suppliers or contribute to poor working practices.

No incidents of modern slavery have been recorded or uncovered within Contented or its known supply chains during the past 12 months.

This policy will be made available to staff, freelancers and subcontractors and communicated through induction and relevant briefing or training activities. Concerns about suspected exploitation, modern slavery or unethical working practices should be raised through Contented's established reporting arrangements, including our Whistleblowing Policy.

One-year action plan

During the next review period, Contented will:

1. continue developing its Tier 1 supplier mapping and include proportionate consideration of modern slavery risks;
2. review responsible recruitment and purchasing expectations, including worker-paid recruitment fees, payment practices and unreasonable commercial pressures;
3. include proportionate modern-slavery awareness in relevant induction and briefing activities for staff, freelancers and subcontractors;
4. develop training material covering warning signs, the ILO forced-labour indicators, responsible procurement and how to report concerns;
5. clarify the process for responding to a suspected modern-slavery incident, including safeguarding, investigation, escalation, external referral and corrective action where appropriate; and
6. review progress through Contented's internal audit and management review processes.

Key performance indicators

Contented will monitor:

- the number and proportion of relevant Tier 1 suppliers mapped or reviewed;
- the number and proportion of relevant staff, freelancers and subcontractors receiving modern-slavery information or awareness;
- the number of concerns raised, investigated and resolved;
- corrective actions identified and completed; and
- completion of the annual policy and statement review.

Where a baseline is not available, the first review will establish a proportionate method for recording it.

Continuous Improvement

We aim to improve our processes and our response to customers in the light of learning from the feedback we receive. This policy is subject to annual review or as necessary.

The Contented Quality Manager monitors this policy and any associated data to improve our business processes. Any issues are analysed to understand the root cause and fed into our annual internal audit and management review to improve our quality systems. Records used to evidence this policy, including spreadsheets, logs and registers, will clearly identify Contented Ltd, the purpose of the record, the period covered, the document owner and the date last updated. The whole process is checked yearly by an external auditor certifying the company to ISO9001:2015.

Every effort has been made to ensure that the information contained in this publication is true and correct at the time of going to press. However, Contented products and services are subject to continuous development and improvement, and the right is reserved to change products and services from time to time. Contented cannot accept liability for loss or damage arising from the use of information in this publication.

If you have a suggestion for improvement of, or a complaint about, any of our services, please email: customer@contented.net

Further Information

Contacts to the certifying and awarding bodies and regulators are available on their websites.

Board approval

This policy and statement was approved by the Board of Directors of Contented Ltd.

Signed:

Gerard Davies

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Director, Contented Ltd
01 October 2026

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